

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO
RICO, et al.,

Debtors.¹

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT
BOARD FOR PUERTO RICO,
as representative of

THE PUERTO RICO ELECTRIC POWER
AUTHORITY (**PREPA**)

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA

Docket No. 22265

PROMESA

Title III

Case No. 17 BK4780-LTS

**URGENT CONSENTED MOTION FOR EXTENSION OF DEADLINES TO FILE
RESPONSE TO OMNIBUS OBJECTION**

To the Honorable United States District Judge Laura Taylor Swain:

COMES NOW, creditor, **O'Neill Security & Consultant Services Inc.** (hereinafter "O'Neill"), and respectfully submits this urgent consented motion (the "Urgent Motion") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Order”), extending by fourteen (14) days, to and including Monday, October 31, 2022, the deadline to file a response to PREPA’s *Five Hundred Thirty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Deficient Claims* [Doc No. 22265] (the “531 Omnibus Objection”). The appearing party has conferred with counsel for PREPA, who consents to this request.

Background

1. On September 16, 2022, PREPA filed the 531 Omnibus Objection [Doc. No. 22265], seeking to disallow several alleged deficient claims, including claim number 28744.

2. The deadline for O’Neill to respond to the 531 Omnibus Objection is October 17, 2022, at 4:00 PM, and the Hearing is scheduled for November 2, 2022, at 9:30 AM.

Request for Relief

3. O’Neill continues to work to gather, review, and assess information necessary to assess the 531 Omnibus Objection and to file a response to the Objection. O’Neill conferred with PREPA’s counsel, who consented² to the requested extension.

4. Accordingly, O’Neill, with PREPA’s consent, proposes the following extensions of the deadlines set forth in the Scheduling Order:

- O’Neill’s deadline to respond to the 531 Omnibus Objection shall be extended by fourteen (14) days, from Monday, October 17, 2022, to **Monday, October 31, 2022.**

² Due to Hurricane Fiona, FOMB decided to extend the objection deadline until 10-31-22, and to adjourn the hearing on the claim until 12-14-22.

- The court will thereafter take the 531 Omnibus Objection on submission and adjourn the hearing on the claim, if necessary, on or after **December 14, 2022**.

Certification of Compliance with Local Rule 9013-1 and the Sixteenth Amended Case Management Procedures

5. Pursuant to Paragraph I.H of the *Sixteenth Amended Notice, Case Management and Administrative Procedures* [ECF No. 20190-1] (the “Case Management Procedures”), O’Neill hereby certifies that it has carefully examined the matter and concluded that there is a true need for an urgent motion; it has not created the urgency through any lack of due diligence; it has made a bona fide effort to resolve the matter without a hearing; it has made reasonable, good-faith communications with PREPA in an effort to resolve or narrow the issues that are being brought to the Court, and PREPA consent to the relief requested herein.

WHEREFORE, it is respectfully requested that this Honorable Court enter the Proposed Order and grant the extension of time requested with any other remedy deemed just and proper.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys or records.

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RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, on this 16th day of October 2022.

s/Elías L. Fernández Pérez
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